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 d.b.a. H.I.S. Loans & Real Estate Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

ORNAN NWANSI, an individual,	)	Case No.: C 06 5345 MEJ
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO EXTEND THE DISCOVERY</b>
v.	)	<b>DEADLINE AND MOVE THE TRIAL</b>
	)	<b>DATE</b>
DOWNEY SAVINGS & LOAN	)	
ASSOCIATION, INC., H.I.S. LOANS & REAL	)	
ESTATE, INC., d.b.a. H.I.S. LOANS & REAL	)	Action filed: August 30, 2006
ESTATE COMPANY; DOES 1 through 100,	)	Trial date: October 22, 2007
inclusive,	)	
	)	
Defendants.	)	

The parties, by and through their counsel of record, stipulate to extend the close of discovery from April 19, 2007 to June 18, 2007 and to move the trial date from October 22, 2007 to a date in January 2008 that is convenient for the court. Pursuant to Civil L.R. 6-2 counsel for defendant H.I.S. LOANS AND REAL ESTATE INC. has attached a declaration stating the reasons for extending the time. The parties hereby stipulate to this request.

IT IS HEREBY STIPULATED that the close of discovery will be June 18, 2007 and that the new trial date will be a date in January 2008 chosen by the court for its convenience.

1 DATED: March 20, 2007

2  
3 LERCH STURMER LLP

4  
5 By /s/  
6 Debra S. Sturmer  
7 Jachyn K. Davis  
8 Attorneys for Defendant H.I.S. Loans & Real  
9 Estate Inc.

10  
11 Dated: March 20, 2007

12 By /s/  
13 Peter W. Clerides, Esq.  
14 Attorney for Plaintiff Ornan Nwansi

15 Dated: March 20, 2007

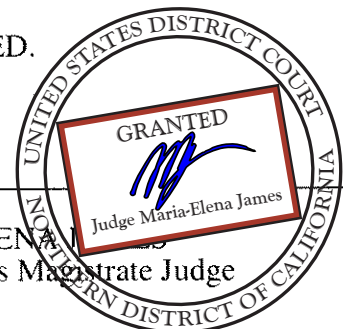
16 DOWNEY SAVINGS AND LOAN ASSN.

17 By /s/  
18 Christine M. Humphries, Esq.  
19 Attorney for Downey Savings and Loan  
20 Association

21 The parties, by and through their counsel of record, stipulate to extend the discovery  
22 deadline until June 18, 2007 and to move the trial to January 2008 with a date convenient to the  
23 court. PURSUANT TO STIPULATION, IT IS SO ORDERED.

24  
25 DATED: April 2, 2007

26 By \_\_\_\_\_  
27 MARIA-ELENA JAMES  
28 United States Magistrate Judge

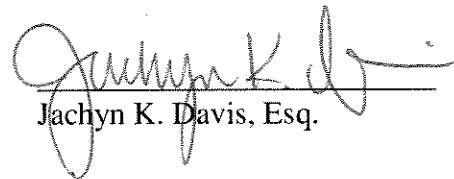


**DECLARATION OF JACHYN K. DAVIS IN SUPPORT OF STIPULATION**

I, JACHYN K. DAVIS, declare:

1. I am associated with the firm of Lerch Sturmer LLP and we are presently the attorneys of record for H.I.S Loans and Real Estate Inc. dba H.I.S. Loans and Real Estate Co., a defendant in this action.
2. I am filing the attached stipulation requesting an order to extend the time of the discovery deadline and to request a new trial date.
3. All parties have consented to extend the discovery deadline because the parties are constantly working to resolve the action, and an early discovery deadline would force the parties to conduct all possible discovery and may cost our clients unnecessary attorneys' fees.
4. All parties have consented to move the trial date because counsel of record for defendant H.I.S Loans and Real Estate Inc. already has a trial date on October 22, 2007 in the Northern District. That trial date was set before the Case Management Order was filed by Judge James.
5. There have been no previous time modifications in the case.
6. The only affect on the schedule would be two extra months for parties to conduct discovery. Additionally, assuming the case goes to trial, the trial would not start until the beginning of next year.

Dated: March 20, 2007

  
Jachyn K. Davis, Esq.